

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

KAREN ROBBINS and)	
LEE ROBBINS,)	
)	
Plaintiffs,)	
)	
vs.)	No.
)	
LYNN J. WALLEY, an Individual,)	
)	
and)	
)	
THE HANNIBAL CLINIC, INC.,)	
A Missouri Corporation,)	
)	
Defendants.)	

COMPLAINT

COME NOW Plaintiffs Karen and Lee Robbins, by and through their undersigned counsel of record, and as their Complaint against Defendants Lynn J. Walley and The Hannibal Clinic, Inc., state as follows:

1. Plaintiffs, lawful wife and husband, are residents of the State of Illinois.
2. Defendant Lynn J. Walley (“Dr. Walley”), is a physician, licensed to practice medicine in the State of Missouri and was at all time relevant engaged in the practice of medicine in Hannibal, Missouri and an employee of Hannibal Clinic.
3. Defendant The Hannibal Clinic, Inc. (“Hannibal Clinic”) is a Missouri Corporation engaged in the business of, among other things, providing medical treatment, with an office for the transaction of its usual and customary business located at 100 Medical Drive, Hannibal, Missouri.

4. Dr. Wally and Hannibal Clinic undertook rendering medical services and care to Plaintiff Karen Robbins in this judicial district, starting on or about January 29, 2016 and continuing until February 1, 2016.

5. This Court has original jurisdiction over this matter pursuant to 28 U.S.C. §1332 based upon the parties' diversity of citizenship as set forth above and the amount in controversy, which exceeds \$75,000, exclusive of interest of costs.

6. This Court is a proper venue for the matter pursuant to 28 U.S.C. §1391(c) in that both Defendants reside in this judicial district and Plaintiff Karen Robbins was first injured and received substantially all of her medical care and treatment herein.

7. Dr. Walley and Hannibal Clinic failed to exercise the degree of care and learning ordinarily exercised by members of the medical profession under the same or similar circumstances in failing to properly perform, in accordance with the standard of care, a laparoscopic left salpingo-oophorectomy surgery for ovarian torsion, causing missed bowel enterotomies.

8. The above-mentioned act and omission constitute negligence on the part of Dr. Walley and Hannibal Clinic.

9. As a direct and proximate result of the aforesaid negligence, Plaintiff Karen Robbins was caused to develop septic shock, acute respiratory failure, acute renal failure, neutropenia, hypokatremia, hypokalemia, metabolic acidosis, lactic acidosis, hypomagnesemia, hypocalcemia, thrombocytopenia secondary to sepsis and neutropenia secondary to sepsis all which required her to be admitted to the medical intensive care unit at Barnes-Jewish Hospital for necessary medical care and treatment for more than thirty (30) days, where she underwent multiple surgical procedures, all of which cost in excess of Four Hundred Thirty-Four Thousand

Dollars (\$434,000.00) and she suffered permanent and debilitating injury, disfigurement, pain and suffering, additional medical expenses and lost wages.

10. As a direct and proximate result of the aforesaid negligence, Plaintiff Lee Robbins has been caused to suffer and continues to suffer the loss of society, consortium, companionship, love, affection, support, and care of his spouse all to his damage.

WHEREFORE, Plaintiffs Karen Robbins and Lee Robbins pray for judgment in their favor and against Defendants The Hannibal Clinic, Inc. and Lynn J. Walley, in an amount in excess of Five Million Dollars (\$5,000,000.00), together with costs of suit, pre-and post-judgment interest, and for such other and further relief as the court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand trial by jury on all issues so triable.

Respectfully submitted,

STONE, LEYTON & GERSHMAN,
A PROFESSIONAL CORPORATION

By: /s/ Joseph R. Dulle

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